

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ABBY CHAMPION, ALANNA ARRINGTON,
AMBAR CRISTAL ZARZUELA MONTERO,
ANNA CLEVELAND, ANOK YAI, BLANCA
PADILLA, BRIONKA HALBERT, BROOKE
ROBINSON, CALLUM STODDART, CARA
TAYLOR, CLAIRE DELOZIER, CYNTHIA
ARREBOLA, DAMIEN MEDINA, DYLAN
CHRISTENSEN, EMILY REBECCA HILL p/k/a
EMI RED, ENIOLA ABIORO, GEORGINA
GRENVILLE, GRACE ELIZABETH HARRY CABE
p/k/a GRACE ELIZABETH, GRACE HARTZEL,
HIANDRA MARTINEZ, JAL BUI, JOÃO KNORR,
KRISTIN LILJA SIGURDARDOTTIR p/k/a
KRISTIN LILJA, LEONA WALTON p/k/a BINX
WALTON, LINEISY MONTERO, LUCIA LOPEZ
AYERDI p/k/a LUCIA LOPEZ, LUISANA
GONZALEZ, MANUELA MILOQUI p/k/a MANU
MILOQUI, MARIA VITORIA SILVA DE
OLIVEIRA p/k/a MARIA VITORIA, MARIAM
URUSHADZE p/k/a MARISHA URUSHADZE,
MAUD HOEVELAKEN, MAYA GUNN, MYRTHE
BOLT, RACHELLE HARRIS, ROCIO MARCONI,
SARA EIRUD, SELENA FORREST, SHUPING LI,
TANG HE, UGBAD ABDI p/k/a UGBAD, VERA
VAN ERP, VIKTORIIA PAVLOVA p/k/a ODETTE
PAVLOVA, XIAOQIAN XU,

Plaintiffs,

-against-

MODA OPERANDI, INC., ADVANCE
PUBLICATIONS, INC. d/b/a CONDE NAST,
ADVANCE MAGAZINE PUBLISHERS, INC. d/b/a
CONDE NAST,

Defendants.
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Case No.: 1:20-cv-07255-LAK

DECLARATION OF CLAIRE DELOZIER

Claire DeLozier declares pursuant to 28 U.S.C. § 1746:

1. I am Claire DeLozier, a plaintiff in this action. This declaration is made in opposition to defendants' respective motions to dismiss my claim under New York Civ. Rights Law §§ 50, 51.

2. I am a professional model.
3. I am signed to, among others, Next New York.
4. I have read the Declaration, dated February 5, 2021, of Faith Kates on behalf of Next Model Management, LLC, and I affirm that all of the paragraphs that refer to me are accurate.
5. My modeling career is centered in New York and a large portion of my modeling jobs occur in New York. It is where I am best known as a model.
6. While I used to live with my parents in Florida, I currently live in New York City.
7. I believe that my property rights in my image, personality and reputation are most strongly connected to New York.
8. For the foregoing reasons, defendants' motions to dismiss my claims under the New York Civil Rights Law should be denied.

Dated this 5 day of February, 2021



CLAIRE DELOZIER